

APPENDIX RECORD
IN CLERK'S OFFICE

Table of Contents 2020 06 14 PM 4: 21

U.S. DISTRICT COURT
DISTRICT OF MASS.

Exhibits 1- 15

The entire lower court and Single Justice
Appendix record.

142 JJC

SUPREME JUDICIAL COURT

Suffolk, ss

Single Justice

Sj - 2020-578

In Re Carla Marie Conforto

PETITION FOR EXTRAORDINARY RELIEF c21183

Introduction

Trial Judge will not appoint counsel. This decision does not satisfy due process clause. Insofar as Hulbert v. Michigan held that once counsel appointed its the duty of the state to provide effective counsel.

Jurisdiction

Jurisdiction is conferred upon this court under the courts common law and Constitutional powers. Secondary jurisdiction is MGL c 21183

Parties

Carla Marie Conforto Mother
 Leslie Martin Attorney DCF
 Commonwealth of Massachusetts

RECEIVED

AUG 17 2020

MAURA S. DOYLE CLERK
 OF THE SUPREME JUDICIAL COURT
 FOR SUFFOLK COUNTY

Facts

Trial Judge Kenneth J King is mad a law student is helping me. The trial judge made me attorney of record when he denied my motion for appointment of counsel and when a law student who happens to know more about law than I do began helping me the trial judge wrote an order, within one hour of learning of this knowledge that usurps that law students right as well as my own right to such help. This is a clear indication the trial judges decision was in bad faith.

Argument

Carla Marie Contro was appointed ineffective counsel. The state is not required to give counsel in a care and protection case but once they chose to give counsel, they have to give effective counsel Halbert v Michigan.

Leslie Arsenault appointed as counsel is a conflict of interest resulting in a total denial of counsel Strickland v Washington.

Trial Judge's decision to deny the motion for appointment of counsel is a denial of a substantive right.

In this case there is no other effective remedy but to seek relief from the Single Justice.

Relief Requested

Appointment of counsel. Fairness demands, this is my baby twins we're talking about not some skate boards, or tires or cars - we're talking about baby twins. The right for Due Process Clause dates all the way back to Magna Carta.

By Carla Marie Contro
401127 Harrison Avenue
Unit Six
Boston, Massachusetts
12th August 2020



The Commonwealth of Massachusetts

SUPREME JUDICIAL COURT

FOR SUFFOLK COUNTY

JOHN ADAMS COURTHOUSE

ONE PEMBERTON SQUARE, SUITE 1300

BOSTON, MASSACHUSETTS 02108-1707

WWW.SJCCOUNTYCLERK.COM

MAURA S. DOYLE
CLERK

September 9, 2020

CASE INFORMATION (617) 557-1100
FACSIMILE (617) 557-1117

ATTORNEY SERVICES (617) 557-1050
FACSIMILE (617) 557-1055

Carla Marie Conforto, Pro Se
1127 Harrison Avenue
Unit 6
Roxbury, MA 02119-3665

RE: No. SJ-2020-0578

IN RE: IMPOUNDED CASE

In accordance with the Rules of Appellate Procedure, Nos. 9(e) and 10(a) and (b), the enclosed copy of the Notice of Appeal and the Notice of Assembly of the Record on Appeal or on Reservation and Report to the Full Court in the above-entitled case are hereby mailed to you.

The appealing party must enter the case in the Supreme Judicial Court for the Commonwealth:

a) if the appeal is subject to S.J.C. Rule 2:21 (copy attached), within fourteen (14) days of the filing of the notice of appeal;

OR

b) if the appeal is subject to Mass. R.A.P. 10(a) and (b), within ten (10) days of the receipt of this notice.

Entry of the case will be made in the Clerk's Office, Supreme Judicial Court for the Commonwealth, John Adams Courthouse, One Pemberton Square, Room 1400, Boston, Massachusetts 02108-1724, upon receipt of the filing fee of \$300.00, or upon written request if the appealing party has been permitted to proceed without payment of fees

in this court.

A copy of the record is available from this office for a fee of
\$.20 per page.

Very truly yours,

A handwritten signature in black ink, appearing to read "Maura S. Doyle". The signature is fluid and cursive, with the first name "Maura" being more prominent.

Maura S. Doyle, Clerk

To: Carla Marie Conforto
Middlesex Juvenile Court / Camb
Clerk - SJC for the Commonwealth

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

**SUPREME JUDICIAL COURT
FOR SUFFOLK COUNTY
No. SJ-2020-0578**

IN RE: CARLA MARIE CONFORTO

DETERMINATION REGARDING FEES AND COSTS BY CLERK

Name of Applicant: Carla Marie Conforto

Address:

FORTHWITH DETERMINATION BY CLERK

 x **ALLOWED FORTHWITH.** The applicant's affidavit appears regular and complete on its face, indicates that the applicant is indigent, and requests waiver, substitution or payment by the Commonwealth of normal fees and costs only. Pursuant to G.L. c. 261, s. 27C(2), the application is therefore **ALLOWED** forthwith without hearing, and the normal fees and costs indicated in the application are:

 WAIVED IN FULL

 TO BE PAID BY THE COMMONWEALTH IN THE AMOUNT OF
\$ _____

_____ REFERRED TO A JUDGE. The applicant's affidavit does not satisfy all conditions of s. 27C(2), and is therefore referred to a judge pursuant to s. 27C(3), because:

_____ The affidavit is not regular and complete on its face.

_____ The affidavit does not indicate that the applicant is indigent with the meaning of s. 27A.

_____ The affidavit requests waiver, substitution or payment by the Commonwealth of extra fees and costs.

Comments:

Describe fees and costs waived:

\$315.00 Filing fee and surcharge

Dated: August 18, 2020

[Signature]
Assistant Clerk

Nicole Sasso

From: Donna Wardynski <donna.wardynski@jud.state.ma.us>
Sent: Tuesday, September 1, 2020 9:18 AM
To: Sasso, Nicole
Subject: FW: Straight docketing Fwd: Follow-up SJ 2020-0578

Donna Wardynski

Bar Docket Coordinator
Supreme Judicial Court for the County of Suffolk
Office of Clerk Maura S. Doyle
One Pemberton Square - Suite 1300
Boston, Massachusetts 02108
617-557-1111

From: Amy Stewart [mailto:amy.stewart@jud.state.ma.us]
Sent: Tuesday, September 1, 2020 9:05 AM
To: Donna Wardynski <donna.wardynski@jud.state.ma.us>
Subject: Straight docketing Fwd: Follow-up SJ 2020-0578

Please docket. Ty.

Sent from my iPhone

Begin forwarded message:

From: returnmypropertynow <returnmypropertynow@protonmail.com>
Date: August 31, 2020 at 4:41:12 PM EDT
To: "amy.stewart@jud.state.ma.us" <amy.stewart@jud.state.ma.us>
Subject: Follow-up SJ 2020-0578
Reply-To: returnmypropertynow <returnmypropertynow@protonmail.com>

Hello Amy,

On August 31, 2020 a Total of six emails were sent from:
returnmypropertynow@protonmail.com

Confirm receipt that all attachments, documents were received successfully.

- Appendix, Petition including Certificate of Service and Affidavit - 6 attachments
- Docket 19CP0037CA - 10 attachments
- Docket cont'd 19CP0037CA - 10 attachments
- Docket 19CP0037CA, Exhibits A,B,C,D - 9 attachments

•Exhibit E - 1 attachment

•Order re "legal advisor" - 4 attachments

Regards

Sent with ProtonMail Secure Email.



The Commonwealth of Massachusetts

SUPREME JUDICIAL COURT

FOR SUFFOLK COUNTY

JOHN ADAMS COURTHOUSE

ONE PEMBERTON SQUARE, SUITE 1300

BOSTON, MASSACHUSETTS 02108-1707

WWW.SJCCOUNTYCLERK.COM

September 9, 2020

CASE INFORMATION (617) 557-1100
FACSIMILE (617) 557-1117

ATTORNEY SERVICES (617) 557-1050
FACSIMILE (617) 557-1055

MAURA S. DOYLE
CLERK

Carla Marie Conforto, Pro Se
1127 Harrison Avenue
Unit 6
Roxbury, MA 02119-3665

RE: No. SJ-2020-0578

IN RE: IMPOUNDED CASE

NOTICE OF ASSEMBLY OF THE RECORD
ON APPEAL OR ON RESERVATION AND REPORT TO THE FULL COURT

In accordance with the Rules of Appellate Procedure, Rule 9(e), notice this day has been sent to the Clerk of the Supreme Judicial Court for the Commonwealth, along with two (2) certified copies of the docket entries. The record has been fully assembled in the office of the Clerk of the Supreme Judicial Court for Suffolk County.

The appealing party must enter the case in the Supreme Judicial Court for the Commonwealth:

- a) if the appeal is subject to Mass. R. A. P. 10(a) and (b), within ten (10) days of receipt of this notice;
- OR
- b) if the appeal is subject to S.J.C. Rule 2:21 (copy attached) within fourteen (14) days of the filing of the notice of appeal.

This notice does not constitute entry in the Supreme Judicial Court for the Commonwealth.

A handwritten signature in cursive script, reading "Maura S. Doyle".

Maura S. Doyle, Clerk

**RULE 2:21 APPEAL FROM SINGLE JUSTICE DENIAL OF RELIEF ON
INTERLOCUTORY RULING**

(Applicable to civil and criminal cases)

(1) When a single justice denies relief from a challenged interlocutory ruling in the trial court and does not report the denial of relief to the full court, the party denied relief may appeal the single justice's ruling to the full court. Unless the court otherwise orders, the notice of appeal shall be filed with the Clerk of the Supreme Judicial Court for Suffolk County within seven days of the entry of the judgment appealed from. Unless the single justice or the full court orders otherwise, neither the trial nor the interlocutory ruling in the trial court shall be stayed.

(2) The appeal shall be presented to the full court on the papers filed in the single justice session, including any memorandum of decision. Nine copies of the record appendix must be filed in the Office of the Clerk of the Supreme Judicial Court for the Commonwealth within fourteen days after the date on which the appeal is docketed in the full Supreme Judicial Court. The record appendix shall be accompanied by nine copies of a memorandum of not more than ten pages, double-spaced, in which the appellant must set forth the reasons why review of the trial court decision cannot adequately be obtained on appeal from any final adverse judgment in the trial court or by other available means. No response from the prevailing party shall be filed, unless requested by the court.

(3) This rule shall not apply to interlocutory appeals governed by Rule 15 of the Massachusetts Rules of Criminal Procedure.

(4) The full court will consider the appeal on the papers submitted pursuant to this rule, unless it otherwise orders.

If an appeal from a judgment is subject to S.J.C Rule 2:21, set forth above, please note that:

1) within seven (7) days of the entry of the judgment, (unless the court otherwise orders), the appealing party must file a notice of appeal with the Clerk of the Supreme Judicial Court for Suffolk County; AND

2) within fourteen (14) days of the date of the filing of the notice of appeal, the appealing party must:

- docket the appeal in the office of the Clerk of the Supreme Judicial Court for the Commonwealth and pay any docket fee required by law; AND

3) within fourteen (14) days of the docketing of the appeal in the office of the Clerk of the Supreme Judicial Court for the Commonwealth, the appealing party must:

- file nine (9) copies of the memorandum and nine (9) copies of the record appendix with the Clerk of the Supreme Judicial Court for the Commonwealth.

Courtney O'Loughlin

From: Amy Stewart <amy.stewart@jud.state.ma.us>
Sent: Wednesday, September 2, 2020 8:02 AM
To: Courtney O'Loughlin
Cc: Nicole Sasso; Burke, James
Subject: FW: SJ-2020-0578 In Re Carla Marie Conforto APPENDIX, PETITION, AFFIDAVIT
Attachments: 3C436E87-5F4C-4504-BC71-0F6B40573338.jpeg;
E889AD0F-3AEE-4AD2-8232-95C627E86773.jpeg; A6682A51-5E13-4DDC-8FFE-
D66F0676662A.jpeg; 736938E5-7901-4772-AE7C-1D6E2CC13B5E.jpeg;
6C7051D6-334C-43FC-9367-E1888CDA49CE.jpeg; 22D660CE-2810-4068-989E-
CEE12D0D17AF.jpeg

Follow Up Flag: Follow up
Flag Status: Completed

Good morning!

Courtney: I've received several emails from Carla Marie Conforto (you may remember her as Akkima's friend). She has a case SJ-2020-0578 and is seeking to file additional papers in the case. Unfortunately, she keeps sending everything as Jpeg files. Could you please print the emails and attachments (I will forward to you) and docket them in SJ-2020-0578? Also could you please try to upload the papers to LiveLink?

Donna is out today due to a death in her extended family so I am hopeful that you may have capacity to help me today. If not, please let me know and I will work with Nikki instead although I know she is supporting Eric today.

Thank you,
Amy

Amy C. Stewart
Second Assistant Clerk
Office of Clerk Maura S. Doyle
Supreme Judicial Court for the County of Suffolk
(617) 557-1184 (direct)
Amy.Stewart@jud.state.ma.us

**** Please refer to the Clerk's Office's FAQ during the COVID-19 crisis for answers to common filing and procedural questions.**
<https://www.mass.gov/guides/sic-clerks-office-for-the-county-of-suffolk-faqs-during-the-covid-19-crisis#single-justice-matters>

From: returnmyproperty [mailto:returnmyproperty@protonmail.com]
Sent: Monday, August 31, 2020 3:17 PM

To: Amy Stewart <amy.stewart@jud.state.ma.us>

Subject: SJ-2020-0578 In Re Carla Marie Conforto APPENDIX, PETITION, AFFIDAVIT

Hello Amy,

I received your email and will send the rest of the CASE according to the APPENDIX (Table of Contents).
When I figure out how to label attachments using this software/device I will certainly do so.

Attached:

APPENDIX 1p

PETITION FOR EXTRAORDINARY RELIEF 2p

AFFIDAVIT 3p

Regards,

Carla Marie Conforto

Sent with ProtonMail Secure Email.

SUPREME JUDICIAL COURT

1.42 JJC

Suffolk, ss

Single Justice

SJ 2020 0578

In Re Carla Marie Conturb

PETITION FOR EXTRAORDINARY RELIEF c21163

Introduction

Trial Judge will not appoint counsel. This decision does not satisfy due process clause. In re: Holbert v. Michigan held that once counsel appointed it is the duty of the state to provide effective counsel.

Jurisdiction

Jurisdiction is conferred upon this court under the courts common law and Constitutional powers. Standing jurisdiction is MGLc 211B.

Parties

Carla Marie Conturb Mother
 Leslie Martin Attorney DCF
 Commonwealth of Massachusetts

Facts

Trial Judge Kenneth J King is mind a law student is helping me. The trial judge made me attorney of record when he denied my motion for appointment of counsel and when a law student who happens to know more about law than I do began helping me the trial judge wrote an order within one hour of learning of this knowledge that usurps that law student's right as well as my own right to such help. This is a clear indication the trial judge's decision was in bad faith.

APPENDIX

Table of Contents

PETITION FOR EXTRAORDINARY RELIEF #21183 2 pages

AFFIDAVIT OF INDIGENCY 2 pages

19C00532A MASSACHUSETTS MIDDLESEX COUNTY PUBLIC DOCKET REPORT 22 pages

AFFIDAVIT IN SUPPORT OF MOTION FOR APPT OF COUNSEL 3 pages

EXHIBITS A, B, C, D, E

A 7.22.20 ORDER re Hohen & Capron UNITED STATES DISTRICT COURT 3 pages

B 7.12.20 ORDER re TRIAL PARTICIPATION MIDDLESEX JUVENILE.. 1 page

C 7.14.20 ORDER re APPOINTMENT of COUNSEL APPEALS COURT 2 pages

D 7.14.20 ORDER re MOTION TO DISCHARGE COUNSEL MIDDLESEX JUV.. 2 pages

E 7.14.20 ORDER re MOTION TO WITHDRAW COUNSEL MIDDLESEX JUV 9 pages

CERTIFICATE OF SERVICE 1 page

ST-2020-0578

wPZ

Argument

Carla Marie Conforto was appointed ineffective counsel. The state is not required to give counsel in a care and protection case but once they choose to give counsel, they have to give effective counsel. Holbert v Michigan.

Leslie Arsenault appointed as counsel is a conflict of interest resulting in a total denial of counsel. Stinckland v Washington. Trial Judge's decision to deny the motion for appointment of counsel is a denial of a substantive right.

In this case there is no other effective remedy but to seek relief from the Single Justice.

Relief Requested

Appointment of counsel. Fairness demands, this is my baby twins we're talking about not some skate boards, or tires or cars - we're talking about baby twins. The right for Due Process Clause dates all the way back to Magna Carta.

By Carla Marie Conforto
41127 Hermer Avenue
Unit 616
Boston, Massachusetts
12th August 2020

CERTIFICATE OF SERVICE

I hereby served a copy on all parties August 21, 2020. Carla Marie Conforto

AFFIDAVIT

35 2020-0578

113

IN SUPPORT OF MOTION FOR APPOINTMENT OF COUNSEL

Carla Marie Conforti, Mother states:

1) I am the Mother of the above captioned matter. I make this affidavit January 6, 2020 on courthouse steps 121 Third Street Cambridge Massachusetts having become aware Leslie Aernault was not communicating with me due to an extreme conflict of interest to include animosity over a relationship between her, her daughter and my family members of sexual and violent nature. She informed me on this date she will address with the judge.

She never told Judge Kenneth J. King the extent of her conflict further refusing to communicate with me through May 2020 and in front of judge Leslie Aernault failed to disclose the above in violation of her canon of ethics.

2) June 2020 an individual informed me that such an extreme conflict of interest amounts to the denial of counsel. US Const Amend 6 Art 12 Mass Dec of Rights

3) The extent of the infringement on my Constitutional Rights could not have been known.

2 of 3 AF 4) The judge denied a second subsequent motion for appointment of counsel
BF2020-0578

5) This is a clear violation of a substantive right

6) There is no other expressed remedy applied.

7) Without Single Justice intervention the risk of erroneous deprivation of Petitioner's interests under Const. Amend. 6, 14, is too high to be Constitutionally tolerable.

8) On July 17, 2020 the Middlesex Juvenile Court kept hanging up on me when I called a total of ten times

9) On July 17, 2020 when I was granted access to the juvenile court they kept me on hold for one hour blocking my access to the court during an ongoing trial

10) A law student helping me heard this and when the judge knew I was being helped by a law student he threw a fit (Bourdeau Smith)

11) Subsequent to the above infringements on my access to the court I resubmitted a motion for appointment of counsel (see exhibits)

Att.

Sif 3 12 The second reason for appointment of counsel was
SJ-2020-052 denied

13 The trial judge tried to "appoint" a legal advisor

14 The judge is supposed to appoint counsel

Signed pursuant to 28 USC § 1746, declarant under penalty of perjury the foregoing
is true and accurate.

31 August 2020

Ry-Orla Morris Caputo

Courtney O'Loughlin

From: Amy Stewart <amy.stewart@jud.state.ma.us>
Sent: Wednesday, September 2, 2020 8:04 AM
To: Courtney O'Loughlin
Subject: FW: SJ-2020-0578 In Re Carla Marie Conforto Docket, Exhibits
Attachments: 26DEA11D-A785-4617-B2D7-91665A07DA6C.jpeg; 590D8E95-47F4-4BD5-A0B7-F63F51A3004E.jpeg; F1556842-076D-4D2E-97B4-13F84A3C94C2.jpeg; A51B25B6-84DA-4D0F-B0BE-682CF0F664EE.jpeg; 3FDEA4D2-A2E3-4541-A46D-AADC1839F3A.jpeg; 0A8F8C0A-E683-4625-9F8D-F80A9A3472F4.jpeg; BAE5A5AD-DFFA-4EA1-BEF5-986EE3C4CD3B.jpeg; 30CFE3F3-59E8-4E39-B3E7-EF8B502DC511.jpeg; 2E5E5EA9-C07D-4EE5-84EF-B40605FBE5CA.jpeg

Please see my prior email. Attached are additional filings from Conforto to be docketed in SJ-2020-0578. Ty.

Amy C. Stewart
Second Assistant Clerk
Office of Clerk Maura S. Doyle
Supreme Judicial Court for the County of Suffolk
(617) 557-1184 (direct)
Amy.Stewart@jud.state.ma.us

**** Please refer to the Clerk's Office's FAQ during the COVID-19 crisis for answers to common filing and procedural questions.**
<https://www.mass.gov/guides/sic-clerks-office-for-the-county-of-suffolk-faq-during-the-covid-19-crisis#single-justice-matters>

From: returnmypropertynow [mailto:returnmypropertynow@protonmail.com]
Sent: Monday, August 31, 2020 4:12 PM
To: amy.stewart@jud.state.ma.us
Subject: SJ-2020-0578 In Re Carla Marie Conforto Docket, Exhibits

Attached: Pages 21 & 22 of 22
MASSACHUSETTS MIDDLESEX COUNTY JUVENILE COURT
Public Docket Report 19CP0037CA total:22 pages
pages 21& 22

EXHIBITS A, B, C, D

Sent with [ProtonMail](#) Secure Email.

Courtney O'Loughlin

From: Amy Stewart <amy.stewart@jud.state.ma.us>
Sent: Wednesday, September 2, 2020 8:04 AM
To: Courtney O'Loughlin
Subject: FW: SJ-2020-0578 In Re Carla Marie Conforto Exhibit E
Attachments: B51D2C88-9AF5-4013-883C-9A96398FC3A1.jpeg

Please see my prior email. Attached are additional filings from Conforto to be docketed in SJ-2020-0578.

This is the last email Ty.

Amy C. Stewart
Second Assistant Clerk
Office of Clerk Maura S. Doyle
Supreme Judicial Court for the County of Suffolk
(617) 557-1184 (direct)
Amy.Stewart@jud.state.ma.us

**** Please refer to the Clerk's Office's FAQ during the COVID-19 crisis for answers to common filing and procedural questions.**
<https://www.mass.gov/guides/sjc-clerks-office-for-the-county-of-suffolk-faqs-during-the-covid-19-crisis#single-justice-matters>

From: returnmypropertynow [mailto:returnmypropertynow@protonmail.com]
Sent: Monday, August 31, 2020 4:23 PM
To: amy.stewart@jud.state.ma.us
Subject: SJ-2020-0578 In Re Carla Marie Conforto Exhibit E

Attached:
EXHIBIT E
ORDER RE MOTION TO WITHDRAW COUNSEL

Sent with ProtonMail Secure Email.

COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, SS

JUVENILE COURT DEPT.

CAMBRIDGE DIVISION

DOCKET NO: 18CF0067CA

RE: CARE & PROTECTION OF CONFORTO-PETION-GUIRAND CHILDREN

MOTION TO WITHDRAW AS STAND-BY COUNSEL

NOW COMES attorney Leslie J. Arseneault, stand-by counsel for Carla Marie Conforto, mother of the children in the above Care and Protection, who respectfully requests this Honorable Court to allow her Motion to Withdraw as stand-by counsel in this matter.

In support of this motion, counsel submits the attached Affidavit of Leslie J. Arseneault.

WHEREFORE, Attorney Leslie J. Arseneault, respectfully requests that this court grant her Motion to Withdraw and to allow client, Carla Marie Conforto, to obtain substitute counsel or to represent herself *pro se*.

Respectfully Submitted on July 11, 2020,

By Leslie J. Arseneault



Leslie J. Arseneault, Esq.
BBO# 693254
P.O. Box 769
Medford, MA. 02155
(781) 690-2985
Lacc58@ms.com

7-14-20
M. L. M.
J. P. F.
(Kenneth K. J.)

Case 1:20-cv-11352-RGS Document 8 Filed 07/22/20 Page 1 of 1

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CIVIL ACTION NO. 20-11352-RGS

CARLA MARIE CONFORTO

v.

COMMISSIONER LINDA S. SPEARS

FINAL ORDER OF DISMISSAL

In accordance with the Order dated July 22, 2020, dismissing this action for the reasons stated therein, it is hereby ORDERED that the above-captioned matter is dismissed in its entirety.

Date: 7/22/2020

/s/ Richard G. Stearns

UNITED STATES DISTRICT JUDGE

Commonwealth of Massachusetts

Middlesex ss.

No. 19CP0037CA

Care and Protection of Deice, Oliver, Towner and Kelinde

MOTION TO DISCHARGE COUNSEL AND FOR THE APPOINTMENT OF COUNSEL

Now comes Petitioner in the above captioned matter and who does move this court for the discharge of Counsel and for appointment of new counsel.

1. Ineffective and sporadic communication with counsel has effected adequate representation Strickland v. Washington 466 U.S. 668 (1984)
- 2) Counsel's deficient performance has provided the Petitioner with as to deprive her of full and fair care and protection process as guaranteed by the Sixth and Fourteenth Amendment and Article 12 Mass Dec. Rights.
- 3) Counsel's behavior has fallen measurably below that which might be expected from an ordinary fallible lawyer in the circumstances. Commonwealth v. Salas 361 Mass 89 (1974).
- 4) Appointed counsel has been rendered ineffective due to conflict of interest, due to the extreme nature due to extensive influence of a conflict of interest Strickland v. Washington at 344.

WHEREFORE as for grounds therein are recited directly in Const. Amend 6 14 and Art 12 Mass Dec. Rights

3rd July 2020
Carla Marie Carabba

COPIES OF PAPERS
Certified true and correct copy of motion and affidavit as of papers actually presented

1122 Harrison Avenue Unit 202
Boston, Massachusetts

Allowed as to discharge of counsel. Find a to
 appointment of new counsel.
 (Karneths Kin.)
 - 7/14/200

COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, SS

JUVENILE COURT DEPARTMENT
CAMBRIDGE DIVISION
NO. 19 CP 0037 CA

In Re: OLIVIER PETION)
 DOB: 3/6/2006)
 DESIREE PETION)
 DOB: 8/12/2004)
 EVA ARIANE GUIRAND)
 aka BABY GIRL CONFORTO,)
 aka KEHINDE ARJEN)
 aka EVA CONFORTO)
 DOB: 7/10/2017)
 STEVE ARJEN GUIRAND)
 aka BABY BOY CONFORTO,)
 aka TAEWOE ARJEN,)
 aka STEVE CONFORTO)
 DOB: 7/09/2017)

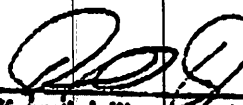
ORDER REGARDING CARLA MARIE
CONFORTO'S PARTICIPATION IN THE
TRIAL OF THIS MATTER

Following a hearing on July 17, 2020, it is hereby ORDERED, that if the mother of the minor children, Carla Marie Conforto, seeks to participate in the ongoing trial of this matter, she must appear in person at the Cambridge Juvenile Court, 121 Third St., Cambridge, MA for every hearing in this case. This Order is necessary based on the fact that on July 17, 2020 Carla Marie Conforto called into the ongoing trial with a third person, who identified himself as Arthur Burnham, a self-described student of the law, listening in to assist her. Mr. Burnham did not identify himself as a lawyer and has not filed an appearance in this case. When told that the proceedings are confidential and that a third party cannot listen in, Carla Marie Conforto repeatedly refused to take her phone off speaker and Mr. Burnham could be heard advising Carla Marie Conforto on what to say in response to this Court's questions and comments and other counsel's arguments throughout the balance of the hearing. Therefore, I conclude that it is necessary to have Carla Marie Conforto physically present in the courthouse and in the courtroom during the continued trial proceedings, to ensure the confidentiality of the proceedings.

This trial will resume on July 27 at 10:00 AM and will continue on July 28 at 9:00 AM. If Carla Marie Conforto is not present, she will be deemed to have forfeited her right to participate in these proceedings.

SO ORDERED.

DATED: July 17, 2020


 Kenneth J. King, Associate Justice,
 Middlesex County Juvenile Court

Commonwealth of Massachusetts

Care and Protection of Durable, Choice, Income and Retention

AFFIDAVIT

1. Carla Marie Conferlo, being duly sworn, states
- 2) I am the Affiant in the above entitled matter. I make this statement in support of this motion to discharge counsel and for new counsel to be appointed new counsel.
- 3) There exists a conflict of interest with current appointed counsel.
- 4) Upon information and belief appointed counsel Leslie Ascarelli was personally involved with a sexual and violent incident with a family member of my own.
- 5) Upon information and belief Leslie Ascarelli was used by a family member of my own and such lawsuit created animosity which interferes with effective representation.
- 6) To date counsel has not effectively communicated with this petitioner and has not zealously informed this petitioner of her rights and status.
- 7) This petitioner is not comfortable meeting forward with current counsel nor appears in her office at EPCS due to the extreme nature of the conflict and overwhelming animosity.
- 8) This petitioner is entitled to effective counsel under the Sixth Amendment to United States Constitution Art 12 of Mass. Dec. of Rights.
- 9) Counsel failed to tell me rights changed and counsel

Signed pursuant to 2015C § 174b, I declare under penalty of perjury the foregoing is true and accurate.
2nd July 2020 Carla Marie Conferlo

COMMONWEALTH OF MASSACHUSETTS

APPEALS COURT CLERK'S OFFICE
John Adams Courthouse
One Pemberton Square, Suite 1200
Boston, Massachusetts 02108-1705
(617) 725-8106

July 16, 2020

RE: No. 2020-J-0310
Carla Marie Conforto, Pro Se
c/o 1127 Harrison Avenue
Unit 6
Roxbury, MA 02119

Lower Ct. No.: 19CP0037CA

DEPARTMENT OF CHILDREN AND FAMILIES & others

vs.

MOTHER & others

NOTICE OF DOCKET ENTRY

Please take note that on July 16, 2020, the following entry was made on the docket of the above-referenced case:

ORDER: The mother in a child welfare matter pending before the Cambridge Juvenile Court has filed a petition, pursuant to G. L. c. 231, § 118, first para., seeking review of the order denying her motion to appoint successor counsel. To succeed, the mother's petition and supporting materials must demonstrate that the Juvenile Court judge's order allowing standby counsel's motion to withdraw and the mother's motion to discharge counsel, but denying the mother's motion to appoint successor counsel, was the product of a clear error of law or abuse of discretion. See *Jet-Line Services, Inc. v. Board of Selectmen of Stoughton*, 25 Mass. App. Ct. 645, 646 (1988). My authority to overrule an interlocutory order of a trial court judge should "be exercised in a stinting manner with suitable respect for the principle that the exercise of judicial discretion circumscribes the scope of available relief." *Edwin Sage Co. v. Foley*, 12 Mass. App. Ct. 20, 25 (1981).

"[A] parent may waive the right to counsel either explicitly" or "through conduct." *Adoption of Raissa*, 93 Mass. App. Ct. 447, 452 (2018). I note that "[t]he key to waiver by conduct is misconduct occurring after an express warning has been given to the [parent] about the [parent's] behavior and the consequences of proceeding without counsel." *Id.* I further note that, while it is within the judge's sound discretion whether to grant a request for new counsel on the eve of trial, "the judge should make findings showing a balancing between the [parent's] rights and the interests of the" public and the child "and demonstrating that discretion was in fact exercised." *Commonwealth v. Carcetti*, 53 Mass. App. Ct. 558, 561 (2000). Here, based upon the limited record before me, I am unable to discern either an error of law or an abuse of discretion in the judge's order denying the mother's request for successor counsel on the eve of trial and in light of the mother's history with appointed counsel as demonstrated by the Juvenile Court's docket



MASSACHUSETTS
MIDDLESEX COUNTY JUVENILE COURT
Public Docket Report

07/15/2020	Motion allowed Release of prior hearing testimony to incorporate into on going trial.	King
07/15/2020	Temporary mittimus to DOF. [FORM] Judge: King, Hon. Kenneth J	King

I HEREBY CERTIFY THAT THIS DOCUMENT IS
A TRUE COPY OF A DOCUMENT FILED WITH THE
OFFICE OF THE CLERK-MAGISTRATE OF THIS COURT

Elizabeth Shreeve
Clerk-Magistrate

Printed: 07/16/2020 9:03 am

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MASSACHUSETTS
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Public Docket Report

06/11/2020	Mother present in Court. Judge: King, Hon. Kenneth J	King
06/11/2020	Father not present. Judge: King, Hon. Kenneth J	King
06/11/2020	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J	King
06/11/2020	Motion allowed expedited homestudy.	King
06/11/2020	Court issues order no action taken on motion for restraining order to prevent DCF from removing child from current placement- but absent an emergency, DCF to give parties 10 days notice- see motion as endorsed.	King
07/07/2020	Probation homestudy filed.	
07/09/2020	Affidavit of Oliver Petition filed.	
07/09/2020	Request to Leslie Martin filed.	
07/09/2020	Motion filed Compel the commonwealth for the entire court record.	
07/09/2020	Motion filed Discharge counsel and for appointment of counsel.	
07/09/2020	Affidavit filed.	
07/09/2020	Motion filed Compel the commonwealth to facilitate petitioner access to her biological children via visitation.	
07/09/2020	Affidavit filed.	
07/13/2020	Motion filed Motion to Withdraw and Affidavit.	
07/13/2020	Stipulation of Facts of Desiree Petition filed.	King
07/13/2020	Supplemental Witness and Exhibit List Since June 5, 2020 on behalf of the Minor child, Desiree Petition filed.	King
07/14/2020	Court issues order Case heard via ZOOM due to COVID19 emergency.	King
07/14/2020	Mother present in Court. Judge: King, Hon. Kenneth J	King
07/14/2020	Motion allowed Atty Arsenaults motion to withdraw.	King
07/14/2020	Attorney removed/appearance vacated on behalf of mother. Judge: King, Hon. Kenneth J	King
07/14/2020	Motion allowed to discharge counsel and for the appointment of counsel.	King
07/14/2020	Motion allowed in part Allowed as to discharge, denied as to appointment of new counsel.	King
07/14/2020	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J	King
07/14/2020	Court issues order hearing stayed until 7/15/2020 @2pm.	King
07/14/2020	amended affidavit of Olivier Petition filed.	King
07/15/2020	Court issues order Case heard via ZOOM due to COVID19 emergency.	King
07/15/2020	Father not present. Judge: King, Hon. Kenneth J	King
07/15/2020	Mother present in Court. Judge: King, Hon. Kenneth J	King

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MASSACHUSETTS
MIDDLESEX COUNTY JUVENILE COURT
Docket Report

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SEP 03 2020

MAURA S. DOYLE CLERK
OF THE SUPREME JUDICIAL COURT
FOR SUFFOLK COUNTY

18CP0037CA in the Matter of: Petion et. al., Guirand et. al.

CASE TYPE: Care & Protection	FILE DATE: 02/21/2019
ACTION CODE: INCP	CASE TRACK:
DESCRIPTION: Care and Protection Petition, G.L. c. 119, § 24	
CASE DISPOSITION DATE: 03/20/2020	CASE STATUS: Suspended-Covid-19
CASE DISPOSITION: Pending	STATUS DATE: 02/21/2019
CASE JUDGE: King, Kenneth J.	CASE SESSION:

DCM TRACK		
Tickler Description	Due Date	Completion Date
Investigator Report Due	07/12/2019	08/05/2019

PARTIES		
Petitioner DCF - Arlington Dept. of Children & Families 30 Mystic Street Arlington, MA 02474	DCF Attorney Leslie Marie Martin Department of Children and Families Department of Children and Families 30 Mystic St Arlington, MA 02474-1155 Work Phone (781) 641-8250 Added Date: 05/28/2020	666943
Child Guirand, Eva Ariane 3780 Mystic Valley Parkway Apt. 227 Medford, MA 02155	Appointed CP/CHINS/CRA/GU Karin Wilinski Karin Wilinski, Attorney at Law Karin Wilinski, Attorney at Law 233 Needham St Suite 300 Newton Upper Falls, MA 02484 Work Phone (617) 628-7711 Added Date: 02/22/2019	666178
Child Guirand, Steve Arjen 3780 Mystic Valley Parkway Apt. 227 Medford, MA 02155	Appointed CP/CHINS/CRA/GU Karin Wilinski Karin Wilinski, Attorney at Law Karin Wilinski, Attorney at Law 233 Needham St Suite 300 Newton Upper Falls, MA 02484 Work Phone (617) 628-7711 Added Date: 02/22/2019	666178

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MIDDLESEX COUNTY JUVENILE COURT
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Child Petion, Desiree Penelope 3780 Mystic Valley Parkway Apt. 227 Medford, MA 02155	Appointed CP/CHINS/CRA/GU M. Therese Roche Law Offices of M. Therese Roche Law Offices of M. Therese Roche 171 Swanton St Suite 9 Winchester, MA 01890 Work Phone (781) 721-4733 Added Date: 03/11/2019	423810
Child Petion, Olivier 3780 Mystic Valley Parkway Apt. 227 Medford, MA 02155	Appointed CP/CHINS/CRA/GU Joan M Altamore Joan M. Altamore, Esquire Joan M. Altamore, Esquire 39 Glendower Rd Roslindale, MA 02131 Work Phone (617) 886-1719 Added Date: 03/14/2019	640468
Respondent 1 Contorno, Carla Marie c/o 1127 Harrison Avenue Unit 8 Boston, MA 02119	Appointed CP/CHINS/CRA/GU Thomas W Fothergill Law Office of Thomas W Fothergill Law Office of Thomas W Fothergill 200 Jefferson Rd Suite 208 Wilmington, MA 01887 Work Phone (781) 438-1122 Added Date: 08/07/2020	646135
Respondent 2 Guirand, Steve 28 Silvia Court No. 1 Hyde Park, MA 02138	Appointed CP/CHINS/CRA/GU Mary M Santoro Mary M. Santoro, Attorney-at-Law Mary M. Santoro, Attorney-at-Law P O Box 938 Medford, MA 02155-0010 Work Phone (781) 881-3771 Added Date: 03/07/2019	655432
Respondent 2 Petion, Andre G 39 Maple Street Unit 404 Hyde Park, MA 02138		

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MASSACHUSETTS
SUFFOLK COUNTY JUVENILE COURT
Docket Report

EVENTS					
Date	Session	Event	Result		Resulting Judge
03/04/2019	Cambridge Session	Preliminary Hearing (CV)	Rescheduled		King
03/05/2019	Cambridge Session	Preliminary Hearing (CV)	Held		King
03/07/2019	Cambridge Session	Warrant/Precept Hearing	Held		King
03/11/2019	Cambridge Session	Temporary Custody Hearing	Rescheduled		King
03/11/2019	Cambridge Session	Preliminary Hearing (CV)	Held		King
03/14/2019	Cambridge Session	Temporary Custody Hearing	Rescheduled		King
03/18/2019	Cambridge Session	Preliminary Hearing (CV)	Held		King
03/21/2019	Cambridge Session	Temporary Custody Hearing	Held		King
03/25/2019	Cambridge Session	Warrant/Precept Hearing	Held		King
03/25/2019	Cambridge Session	Temporary Custody Hearing	Rescheduled		King
03/25/2019	Cambridge Session	Report	Rescheduled		King
03/27/2019	Cambridge Session	Temporary Custody Hearing	Held		King
03/27/2019	Cambridge Session	Report	Held		King
04/12/2019	Cambridge Session	Motion Hearing	Held		King
04/18/2019	Cambridge Session	Motion Hearing	Held		King
04/18/2019	Cambridge Session	Temporary Custody Hearing	Held		King
06/13/2019	Cambridge Session	Status Hearing	Held		King
07/17/2019	Cambridge Session	Motion Hearing	Held		King
07/18/2019	Cambridge Session	Report	Held		King
07/25/2019	Cambridge Session	Motion Hearing	Held		King
08/12/2019	Cambridge Session	Report	Held		King
10/04/2019	Cambridge Session	Motion Hearing	Held		King
10/24/2019	Cambridge Session	Motion Hearing	Held		King
11/15/2019	Cambridge Session	Report	Rescheduled		King
11/28/2019	Cambridge Session	Report	Held		King
01/08/2020	Cambridge Session	Motion Hearing	Held		King
01/13/2020	Cambridge Session	Motion Hearing	Held		King
01/23/2020	Cambridge Session	Report	Held		King
02/08/2020	Cambridge Session	Pre Trial Conference (CR/CV)	Held		King
02/08/2020	Cambridge Session	Other Hearing	Held		King
03/09/2020	Cambridge Session	Permanency Hearing	Rescheduled		King
03/09/2020	Cambridge Session	Hearing on Merits (CR/CV)	Held - NDCP Trial		King
03/12/2020	Cambridge Session	Hearing on Merits (CR/CV)	Rescheduled		King

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03/12/2020	Cambridge Session	Permanency Hearing	Rescheduled	King
03/13/2020	Cambridge Session	Hearing on Merits (CR/CV)	Rescheduled	King
03/23/2020	Cambridge Session	Warrant/Precept Hearing	Held	Tan
03/23/2020	Cambridge Session	Hearing on Merits (CR/CV)	Rescheduled-Covid-19 emergency	King
03/24/2020	Cambridge Session	Hearing on Merits (CR/CV)	Rescheduled-Covid-19 emergency	King
03/25/2020	Cambridge Session	Hearing on Merits (CR/CV)	Rescheduled-Covid-19 emergency	King
03/28/2020	Cambridge Session	Hearing on Merits (CR/CV)	Rescheduled-Covid-19 emergency	King
03/30/2020	Cambridge Session	Warrant/Precept Hearing	Held	Tan
05/18/2020	Cambridge Session	Other Hearing	Rescheduled	King
05/28/2020	Cambridge Session	Other Hearing	Rescheduled-Covid-19 emergency	Tan
05/28/2020	Cambridge Session	Other Hearing	Held	King
06/11/2020	Cambridge Session	Other Hearing	Held	King
07/14/2020	Cambridge Session	Hearing on Merits (CR/CV)	Held - NOCP Trial	King
07/15/2020	Cambridge Session	Hearing on Merits (CR/CV)	Held - NOCP Trial	King
07/17/2020	Cambridge Session	Hearing on Merits (CR/CV)	Held - NOCP Trial	King
07/27/2020	Cambridge Session	Hearing on Merits (CR/CV)	Held - NOCP Trial	King
07/28/2020	Cambridge Session	Hearing on Merits (CR/CV)	Held - NOCP Trial	King
08/08/2020	Cambridge Session	Hearing on Merits (CR/CV)		
08/10/2020	Cambridge Session	Hearing on Merits (CR/CV)		
08/21/2020	Cambridge Session	Hearing on Merits (CR/CV)		
08/22/2020	Cambridge Session	Hearing on Merits (CR/CV)		
08/23/2020	Cambridge Session	Hearing on Merits (CR/CV)		

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MASSACHUSETTS
 LESEX COUNTY JUVENILE COURT
 Docket Report

INFORMATIONAL DOCKET ENTRIES				
Date	Ref	Description		Judge
02/21/2019		Petition filed.		
02/21/2019		Affidavit disclosing care and custody filed.		
02/21/2019		Affidavit of petitioner filed.		
02/21/2019		Summons for mother to issue. [FORM]		Sheehy
		Judge: Sheehy, C-M Elizabeth		
02/21/2019		Summons for father to issue. [FORM]		Sheehy
		Judge: Sheehy, C-M Elizabeth		
02/21/2019		Filed On this date Patricia M Osgood, Esq. added as Appointed CP/CHINS/CRA/GU for Respondent 1 Carla M Conforto Appointed for the purpose of Care and Protection Cases c. 119, s.23(a)(3) t Judge Hon. Jay D Blitzman.		
02/21/2019		Filed On this date Cindy A Fenichel, Esq. added as Appointed CP/CHINS/CRA/GU for Respondent 2 Andre G Petion Appointed for the purpose of Care and Protection Cases c. 119, s.23(a)(3) t Judge Hon. Jay D Blitzman.		
02/22/2019		Filed On this date Karin Wilinski, Esq. added as Appointed CP/CHINS/CRA/GU fo Child Olivier Petion Appointed for the purpose of Care and Protection Cases c. 119, s.23(a)(3) t Judge Hon. Jay D Blitzman.		
02/22/2019		Filed On this date Karin Wilinski, Esq. added as Appointed CP/CHINS/CRA/GU fo Child Deslee Petion Appointed for the purpose of Care and Protection Cases c. 119, s.23(a)(3) t Judge Hon. Jay D Blitzman.		
02/22/2019		Filed On this date Karin Wilinski, Esq. added as Appointed CP/CHINS/CRA/GU fo Child Baby Gbri Conforto Appointed for the purpose of Care and Protection Cases c. 119, s.23(a)(3) t Judge Hon. Jay D Blitzman.		
02/22/2019		Filed On this date Karin Wilinski, Esq. added as Appointed CP/CHINS/CRA/GU to Child Baby Boy Conforto Appointed for the purpose of Care and Protection Cases c. 119, s.23(a)(3) t Judge Hon. Jay D Blitzman.		
03/04/2019		Mother not present. Judge: King, Hon. Kenneth J		King
03/04/2019		Father not present. Judge: King, Hon. Kenneth J		King

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MASSACHUSETTS
SUFFOLK COUNTY JUVENILE COURT
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03/04/2019	Ordered Attorneys Willinski and Osgood not present, snowstorm.	King
03/05/2019	Precept issued for Oliver Petton, Desiree Petton, Baby Girl Conforto, Baby Boy Conforto. [FORM]	King
03/05/2019	Summons for father to issue. [FORM] Judge: King, Hon. Kenneth J	King
03/05/2019	Court issues order petition issues.	King
03/05/2019	Mother not present. Judge: King, Hon. Kenneth J	King
03/05/2019	Father not present. Judge: King, Hon. Kenneth J	King
03/05/2019	Summons for witness to issue. [FORM] Judge: King, Hon. Kenneth J	King
03/05/2019	FORM: C&P Precept Sent On: 03/05/2019 13:14:22	
03/05/2019	FORM: C&P Precept Sent On: 03/05/2019 13:17:15	
03/05/2019	FORM: C&P Precept Sent On: 03/05/2019 13:17:41	
03/07/2019	Appearance of Counsel by Atty Osgood/mother filed.	
03/07/2019	Summons for mother to issue. [FORM] Judge: King, Hon. Kenneth J	King
03/07/2019	Child before the court and identified. Judge: King, Hon. Kenneth J	King
03/07/2019	Child excused from further hearings. Judge: King, Hon. Kenneth J	King
03/07/2019	Precept recalled. Judge: King, Hon. Kenneth J	King
03/07/2019	Precept returned with service. Judge: King, Hon. Kenneth J	King
03/07/2019	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J	King
03/07/2019	Summons for father to issue. [FORM] Judge: King, Hon. Kenneth J	King
03/07/2019	Filed On this date Brooke M Chen, Esq. added as DCF Attorney for Petitioner DCI - Arlington	

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03/07/2019	Summons for father to issue. [FORM]	King
	Judge: King, Hon. Kenneth J	
03/07/2019	Petition amended children #3 and #4 only (Baby girl and baby boy) father, Steve Guirand, added to petition.	King
03/07/2019	Continuation of the child in the home is contrary to his/her best interests. Judge: King, Hon. Kenneth J	King
03/07/2019	DCF affidavit dated 3/7/19 filed.	King
03/07/2019	Filed On this date Mary M Santoro, Esq. added as Appointed CP/CHINS/CRA/GU for Respondent 2 Steve Guirand Appointed for the purpose of Care and Protection Cases c. 119, s.23(a)(3) t Judge Hon. Kenneth J King.	
03/11/2019	Notice of Special Appearance (by Mother) filed.	
03/11/2019	Motion filed to withdraw by Atty Osgood.	
03/11/2019	Attorney Brooke M Chen, Esq. enters an appearance for DCF - Arlington.	
03/11/2019	Notice of docket entry and judgment from the Supreme Judicial Court filed.	
03/11/2019	Attorney Karin Willms, Esq. enters an appearance for Baby Girl Conforto, Baby Boy Conforto.	King
	Judge: King, Hon. Kenneth J	
03/11/2019	Attorney Cindy A Ferichel, Esq. enters an appearance for Andre G Petion.	
03/11/2019	Court issues order New and separate counsel to be appointed for Deshae a Oliver.	King
03/11/2019	Attorney removed/appearance vacated on behalf of child/defendant. Judge: King, Hon. Kenneth J	King
03/11/2019	Mother present in Court.	
03/11/2019	Petition amended mother's true name "Carla Marie Conforto".	King
	Judge: King, Hon. Kenneth J	
03/11/2019	Motion allowed in part atty Osgood's motion to withdraw allowed but she is to remain as standby counsel.	King
	Judge: King, Hon. Kenneth J	
03/11/2019	refused summons filed.	
03/11/2019	Court issues order mother refuses service of process, court finds mother has actual notice and has been served.	King
	Judge: King, Hon. Kenneth J	
03/11/2019	Court issues order Mother may have copy of docket.	King
	Judge: King, Hon. Kenneth J	
03/11/2019	Court issues order Martin's hearing conducted with mother.	King

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03/11/2019	Appearance by Atty Mary Santoro filed.		
03/11/2019	Father present in court. Judge: King, Hon. Kenneth J		King
03/11/2019	Personal service of summons made on father. Judge: King, Hon. Kenneth J		King
03/11/2019	Father not present. Judge: King, Hon. Kenneth J		King
03/11/2019	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J		King
03/11/2019	Summons for witness to issue. [FORM] Judge: King, Hon. Kenneth J		King
03/11/2019	Court issues order Mother ordered to produce child Destree's address, school and all contact information before next date, see written order in file, copy given to mother in open court.		King
03/11/2019	Filed On this date Karin Wilinski, Esq. dismissed/withdrawn as Appointed CP/CHINS/CRA/GU for Child Olivier Petton		
03/11/2019	Filed On this date Robert Thomas Owens, Esq. added as Appointed CP/CHINS/CRA/GU for Child Olivier Petton Appointed for the purpose of Care and Protection Cases c. 119, s.23(a)(3) t Judge Hon. Jay D Blitzman.		
03/11/2019	Filed On this date Karin Wilinski, Esq. dismissed/withdrawn as Appointed CP/CHINS/CRA/GU for Child Destree Petton		
03/11/2019	Filed On this date M. Therese Roche, Esq. added as Appointed CP/CHINS/CRA/GU for Child Destree Petton Appointed for the purpose of Care and Protection Cases c. 119, s.23(a)(3) t Judge Hon. Jay D Blitzman.		
03/12/2019	Summons for Patricia Conforto for 3/14/2019 returned with service.		
03/12/2019	Summons for Patricia Souza Conforto for 3/14/2019 returned with service.		
03/14/2019	Filed On this date Robert Thomas Owens, Esq. dismissed/withdrawn as Appointed CP/CHINS/CRA/GU for Child Olivier Petton		
03/14/2019	Filed On this date Joan M Altamore, Esq. added as Appointed CP/CHINS/CRA/GU for Child Olivier Petton Appointed for the purpose of Care and Protection Cases c. 119, s.23(a)(3) t Judge Hon. Gloria Y Tan.		
03/14/2019	Motion filed Production of records and Affidavit.		
03/14/2019	Mother present in Court. Judge: King, Hon. Kenneth J		King

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03/14/2019	Father not present. Judge: King, Hon. Kenneth J	King
03/14/2019	special cause affidavit with attachments filed.	King
03/14/2019	Motion filed to produce records.	King
03/14/2019	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J	King
03/15/2019	Summons for Andre Petion returned without service.	
03/18/2019	Mother present in Court. Judge: King, Hon. Kenneth J	King
03/18/2019	Father not present. Judge: King, Hon. Kenneth J	King
03/18/2019	order by Judge King re: Desiree filed.	King
03/18/2019	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J	King
03/18/2019	Court issues order all counsel and mother given copy of order file by Judge King.	King
03/21/2019	Motion filed Motion to correct Scrivners Error.	
03/21/2019	Birth certificate of child filed. [SCAN]	
	Applies To: Petion, Desiree (Child)	
03/21/2019	Statements (mother) filed.	
03/21/2019	Mother present in Court. Judge: King, Hon. Kenneth J	King
03/21/2019	Father not present. Judge: King, Hon. Kenneth J	King
03/21/2019	Court issues order mother may review prior c&p case from this court and may have a certified copy of the docket sheet only- no further dissemination by mother.	King
03/21/2019	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J	King
03/21/2019	Summons for father to issue. [FORM] Judge: King, Hon. Kenneth J	King
03/21/2019	Notice of docket entry and judgment from the Supreme Judicial Court filed.	
03/25/2019	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J	King
03/25/2019	Child/young adult present in court. Judge: King, Hon. Kenneth J	King
03/25/2019	Child before the court and identified. Judge: King, Hon. Kenneth J	King
03/25/2019	Child excused from further hearings. Judge: King, Hon. Kenneth J	King

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SUFFOLK COUNTY JUVENILE COURT
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03/25/2019	Precept recalled. Judge: King, Hon. Kenneth J	King
03/25/2019	Precept returned with service. Judge: King, Hon. Kenneth J	King
03/25/2019	Mother present in Court. Judge: King, Hon. Kenneth J	King
03/25/2019	Court issues order case called back into court for afternoon session- mother and child- Desiree are present in court.	King
03/25/2019	Notice of docket entry and Judgment from the Supreme Judicial Court filed.	
03/27/2019	Summons for father to issue. [FORM] Judge: King, Hon. Kenneth J Apples To: Petton, Oliver (Child); Petton, Desiree (Child); Petton, Andre G (Respondent 2)	King
03/27/2019	Father present in court, Judge: King, Hon. Kenneth J	King
03/27/2019	Social Worker present. Judge: King, Hon. Kenneth J	King
03/27/2019	Colloquy with father conducted. Judge: King, Hon. Kenneth J	King
03/27/2019	Written stipulation filed by father. Judge: King, Hon. Kenneth J	King
03/27/2019	Stipulation approved by judge. Judge: King, Hon. Kenneth J	King
03/27/2019	Temporary custody hearing waived by father. Judge: King, Hon. Kenneth J	King
03/27/2019	Personal service of summons made on father. Judge: King, Hon. Kenneth J	King
03/27/2019	Father's, Andre Petton's, waiver of custody hearing filed.	King
03/27/2019	Court inquired as to whether the parties know or have reason to know that the child is an Indian child subject to ICWA. Judge: King, Hon. Kenneth J	King
03/27/2019	Parties respond no as to knowing or having reason to know that the child is an Indian child subject to ICWA. Judge: King, Hon. Kenneth J	King
03/27/2019	Written stipulation filed by father. Judge: King, Hon. Kenneth J	King
03/27/2019	Colloquy with father conducted. Judge: King, Hon. Kenneth J	King
03/27/2019	Stipulation approved by judge. Judge: King, Hon. Kenneth J	King
03/27/2019	Temporary custody hearing waived by father. Judge: King, Hon. Kenneth J	King

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03/27/2019	father's, Steve Guirand's, right to a custody hearing/right to a placement hearing reserved filed.	King
03/27/2019	Court inquired as to whether the parties know or have reason to know that the child is an Indian child subject to ICWA. Judge: King, Hon. Kenneth J	King
03/27/2019	Parties respond no as to knowing or having reason to know that the child is an Indian child subject to ICWA. Judge: King, Hon. Kenneth J	King
03/27/2019	Mother not present. Judge: King, Hon. Kenneth J	King
03/27/2019	Father present in court. Judge: King, Hon. Kenneth J	King
03/27/2019	Social Worker present. Judge: King, Hon. Kenneth J	King
03/27/2019	Petition amended Father's address: Steve Guirand, 863 Salem Street, Matten, Ma 02148.	King
03/27/2019	Court issues order Mother's right to a temporary custody hearing waived/Oliver's right has been reserved.	King
03/27/2019	Court issues order Investigator to be appointed with report due 08/10/19.	King
03/27/2019	Precept issued for Desiree Penelope Peticion. [FORM]	King
03/27/2019	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J	King
03/27/2019	FORM: C&P Precept Sent On: 03/27/2019 16:05:33 Judge: King, Hon. Kenneth J	King
03/27/2019	Determination made that DCF or its agent's efforts prior to removal were reasonable. Judge: King, Hon. Kenneth J	King
03/28/2019	Investigator appointed: Sally Anne Kinder, Esq. appointed as Investigator On 03/28/2019 by Hon. Kenneth J King	
04/04/2019	Notice of assignment and release filed.	
04/04/2019	Motion filed Hearing.	
04/12/2019	FORM: C&P Precept Sent On: 04/12/2019 12:36:14	
04/12/2019	Mother present in Court. Judge: King, Hon. Kenneth J	King
04/12/2019	Father not present. Judge: King, Hon. Kenneth J	King

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04/12/2019	Motion filed Childrens' motion for funds for DNA testing.	King
04/12/2019	Petition amended Baby Boy's true name: Taawoe Arjen Baby Girl's true name: Keninde Allene.	King
04/12/2019	Court issues order Notice of intent to seek medical care after hearing accepted by the court and DCF authorized to treat.	King
	Judge: King, Hon. Kenneth J	
04/12/2019	Mother present in Court.	King
	Judge: King, Hon. Kenneth J	
04/12/2019	Court issues order Notice of intent to seek medical treatment stayed until 4/18/19.	King
04/12/2019	Court issues order Mother ordered to produce Desires by or before 4/18/19 9AM.	King
04/12/2019	Father not present.	King
	Judge: King, Hon. Kenneth J	
04/12/2019	Mother's document re: release and quitclaim filed.	King
04/12/2019	Mother's document re: release and quitclaim filed.	King
04/12/2019	Mother's document re: release and quitclaim filed.	King
04/12/2019	Mother's document re: release and quitclaim filed.	King
04/12/2019	Temporary mittimus to DCF. [FORM]	King
	Judge: King, Hon. Kenneth J	
04/12/2019	J. King's order re: production of child filed.	King
04/18/2019	Child/young adult present in court.	King
	Judge: King, Hon. Kenneth J	
04/18/2019	Child before the court and identified.	King
	Judge: King, Hon. Kenneth J	
04/18/2019	Child excused from further hearings.	King
	Judge: King, Hon. Kenneth J	
04/18/2019	Continuation of the child in the home is contrary to his/her best interests.	King
	Judge: King, Hon. Kenneth J	
04/18/2019	Determination made that DCF or its agent's efforts prior to removal were reasonable.	King
	Judge: King, Hon. Kenneth J	
04/18/2019	Precept recalled.	King
	Judge: King, Hon. Kenneth J	
04/18/2019	Mother present in Court.	King
	Judge: King, Hon. Kenneth J	
04/18/2019	Father not present.	King
	Judge: King, Hon. Kenneth J	
04/18/2019	affidavit of Carla Marie Conforto filed.	King
04/18/2019	Motion denied quitclaim--treated as motion to return children--see motion as noted.	King

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04/16/2019	Motion allowed DNA testing.	King
04/16/2019	Court issues order mother may have copy of mittimus.	King
04/16/2019	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J	King
04/16/2019	recognition as a civilian (typing error updated 7/16/19) filed.	King
04/16/2019	Motion denied to restore 72 hour hearing. Judge: King, Hon. Kenneth J	King
04/16/2019	Motion allowed Notice of Intent to seek medical treatment- see notice for specifics.	King
04/16/2019	Mother not present. Judge: King, Hon. Kenneth J	King
04/16/2019	Father not present. Judge: King, Hon. Kenneth J	King
04/16/2019	Mr Rogers present in court.	King
04/16/2019	Court issues order Mr Petion waived his temporary custody hearing rights previously.	King
04/16/2019	Exhibit #1-Original Affidavit admitted.	King
04/16/2019	Court issues order Ms Conforto, mother's, right to a temporary custody hearing deemed waived.	King
04/16/2019	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J	King
04/16/2019	Court issues order Any pro se filings will be copied and given to Judge's Lobby for review.	King
08/10/2019	Motion filed Court Investigator's extension of time.	
08/13/2019	Mother not present. Judge: King, Hon. Kenneth J	King
08/13/2019	Father not present. Judge: King, Hon. Kenneth J	King
08/13/2019	Motion allowed extension of time to file inv report. Report now due by 7/12/19.	King
08/13/2019	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J	King
08/13/2019	DCF report in accordance with G.L. c. 119, s. 21A filed. Judge: King, Hon. Kenneth J	King
08/13/2019	Letter from Carney Hospital regarding Ms. Conforto's admittance filed.	
07/09/2019	Special notice of disbelief and demand filed.	
07/16/2019	Motion filed Notice of Intent to view docket/copies of case file, on going access to case file.	
07/17/2019	Motion filed Court investigator extension of time.	
07/17/2019	Motion allowed Court investigator extension of time report now due 8/2/19.	King

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07/18/2019	Mother present in Court. Judge: King, Hon. Kenneth J	King
07/18/2019	Father not present. Judge: King, Hon. Kenneth J	King
07/18/2019	DCF report in accordance with G.L. c. 119, s. 21A filed. Judge: King, Hon. Kenneth J	King
07/18/2019	Court issues order DCF to produce its file within 30 days.	King
07/18/2019	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J	King
07/25/2019	Summons for father to issue. [FORM] Judge: King, Hon. Kenneth J	King
07/25/2019	Mother present in Court. Judge: King, Hon. Kenneth J	King
07/25/2019	Ordered mother appears at 3:10pm for 2pm hearing.	King
07/25/2019	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J	King
07/25/2019	Father present in court. Mr. Guirand Judge: King, Hon. Kenneth J	King
07/26/2019	Personal service of summons made on father. Mr. Guirand Judge: King, Hon. Kenneth J	King
08/02/2019	Court investigation filed.	
08/08/2019	Ordered Mother may have a copy of the court investigation. Judge: King, Hon. Kenneth J	King
08/11/2019	Notice dated 08/08/19 with exhibit a&b and attached affirmation of service filed.	
08/11/2019	Notice's dated 08/08/19 re: liability, rights and property with affirmation of service filed.	
08/12/2019	Mother present in Court. Judge: King, Hon. Kenneth J	King
08/12/2019	DCF report in accordance with G.L. c. 119, s. 21A filed. Judge: King, Hon. Kenneth J	King
08/12/2019	Court issues order DCF case file-initial contact through July 2018-given to mother in hand. Mother ordered not to share or duplicate this file in any way.	King
08/12/2019	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J	King
08/12/2019	Court issues order Any motions must be filed and served by 8/23/19.	King
08/12/2019	Notice re: harm, loss, or injury, Notice re: recision, and affirmation of service filed.	
08/27/2019	Copy of Notice : Property and Affirmation of service filed.	

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08/27/2019	Request for Argument filed. Judge: King, Hon. Kenneth J	King
10/02/2019	Letter to Carla Marie Conforto filed.	Driscoll
10/04/2019	Notice of Pro Se and Affirmation of service filed.	
10/04/2019	Mother present in Court. Judge: King, Hon. Kenneth J	King
10/04/2019	Motion filed Written order pursuant to Juvenile court rules.	King
10/04/2019	Court issues order Temporary restraining order extended -see order.	King
10/04/2019	Father not present. Judge: King, Hon. Kenneth J	King
10/04/2019	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J	King
10/04/2019	Motion allowed Written order pursuant to Juvenile Court rules.	King
10/17/2019	Motion filed To Withdraw as Mother's Counsel by Atty Osgood with Affidavit.	
10/24/2019	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J	King
10/24/2019	Mother present in Court. Judge: King, Hon. Kenneth J	King
10/24/2019	DCF report in accordance with G.L. c. 119, s. 21A filed. Judge: King, Hon. Kenneth J	King
10/24/2019	MOTHER referred to court clinic.	King
10/24/2019	Father not present. Judge: King, Hon. Kenneth J	King
10/24/2019	Motion allowed to withdraw as Mother's counsel by Atty Osgood.	King
10/24/2019	Attorney removed/appearance vacated on behalf of mother. Judge: King, Hon. Kenneth J	King
10/24/2019	Attorney to be appointed for Mother. Judge: King, Hon. Kenneth J	King
10/24/2019	Memo/incident report from Francis Driscoll, Assistant Clerk Magistrate filed.	King
10/24/2019	Written order filed by the court. Regarding Carla Marie Conforto's access to the clerk's office SCAN Judge: King, Hon. Kenneth J	King
10/24/2019	Filed On this date Patricia M Osgood, Esq. dismissed/withdrawn as Appointed CP/CHINS/CRA/GU for Respondent 1 Carla Marie Conforto	
11/14/2019	Filed On this date Margarida M Goncalves, Esq. added as Appointed CP/CHINS/CRA/GU for Respondent 1 Carla Marie Conforto Appointed for the purpose of Care and Protection Cases c. 119, s.23(a)(3) t Judge Hon. Kenneth J King.	

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11/14/2019	Filed On this date Margarida M Goncalves, Esq. dismissed/withdrawn as Appointed CP/CHINS/CRA/GU for Respondent 1 Carla Marie Conforto	
11/14/2019	Filed On this date Daniel J Mahoney, Esq. added as CAFL Staff Attorney for Respondent 1 Carla Marie Conforto	
11/14/2019	Filed On this date Daniel J Mahoney, Esq. dismissed/withdrawn as CAFL Staff Attorney for Respondent 1 Carla Marie Conforto	
11/14/2019	Filed On this date Leslie J Arsenault, Esq. added as Appointed CP/CHINS/CRA/GU for Respondent 1 Carla Marie Conforto Appointed for the purpose of Care and Protection Cases c. 119, s.23(a)(3) t Judge Hon. Kenneth J King.	
11/15/2019	Letter addressed to Judge King from Carla Marie Conforto requesting continuance filed.	King
11/15/2019	DCF report in accordance with G.L. c. 119, s. 21A filed. Judge: King, Hon. Kenneth J	King
11/15/2019	Mother not present. Judge: King, Hon. Kenneth J	King
11/15/2019	Father not present. Judge: King, Hon. Kenneth J	King
11/15/2019	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J	King
11/15/2019	Copy of email to Carla Marie Conforto from Judge King sent by email and to Harrison Ave mailing address filed.	
11/22/2019	Special notice (amended of disbelief and demand for return of abducted children dated 11/13/19 filed.	
11/28/2019	Attorney Leslie J Arsenault, Esq. enters an appearance for Carla Marie Conforto.	King
	Judge: King, Hon. Kenneth J	
11/28/2019	Mother not present. Judge: King, Hon. Kenneth J	King
11/28/2019	Father not present. Judge: King, Hon. Kenneth J	King
11/28/2019	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J	King
11/28/2019	Court issues order special notice of disbelief threatened as request for trial.	King
01/02/2020	Motion filed Dismiss with prejudice for lack of jurisdiction 12/30/19.	
01/08/2020	Mother present in Court. Judge: King, Hon. Kenneth J	King
01/08/2020	Father not present. Judge: King, Hon. Kenneth J	King

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01/08/2020	Motion denied to dismiss (mother's motion).	King
01/08/2020	Motion filed for publication by DCF (as to children #3 and 4- Keninde and Taewoo).	King
01/08/2020	DCF report in accordance with G.L. c. 119, s. 21A filed.	King
	Judge: King, Hon. Kenneth J	
01/13/2020	Mother present in Court.	King
	Judge: King, Hon. Kenneth J	
01/13/2020	Special affidavit in the nature of clear notice of harm with opportunity to refile filed.	
01/13/2020	Motion allowed Publication.	King
01/13/2020	Special notice requiring a memorandum of decision based upon findings and conclusion of law for denial of injured party's special motion to dismiss filed.	
01/13/2020	Order for service by publication as to unknown/unnamed mother in newspaper. [FORM]	King
	Judge: King, Hon. Kenneth J	
01/13/2020	Father not present.	King
	Judge: King, Hon. Kenneth J	
01/13/2020	Temporary mittimus to DCF. [FORM]	King
	Judge: King, Hon. Kenneth J	
01/13/2020	Notice of assignment and release filed.	King
01/22/2020	Court Clinic report filed.	
01/23/2020	Mother present in Court.	King
	Judge: King, Hon. Kenneth J	
01/23/2020	Court issues order motions in limine due by 2/8/2020.	King
01/23/2020	Court issues order witness and exhibit list due by 1/31/2020.	King
01/23/2020	Father not present.	King
	Judge: King, Hon. Kenneth J	
01/23/2020	Motion allowed oral motion to amend motion for publication.	King
01/23/2020	Petition amended Keninde's true name to read: Eva Ariane Guirand and date of birth to read: 7/10/17.	King
01/23/2020	Petition amended Taewoo's true name to read: Steve Arjen Guirand date of birth 7/9/17.	King
01/23/2020	Court issues order publication order amended to add Eva Ariane Guirand and Steve Arjen Guirand publication return date now 3/09/2020.	King
01/23/2020	Paternity established see 19ps0023ca.	King
01/23/2020	Paternity established see 19ps0021ca.	King
01/23/2020	Temporary mittimus to DCF. [FORM]	King
	Judge: King, Hon. Kenneth J	
01/23/2020	notice of special appearance and estoppel, by mother filed.	

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01/23/2020	Order for service by publication as to unknown/unnamed mother in newspaper. [FORM] Judge: King, Hon. Kenneth J	King
01/24/2020	Judge King's Scheduling Order filed.	King
01/31/2020	Proposed witness and exhibit list filed.	
02/05/2020	Motion filed Requesting rules of conduct for Carla Marie Conforto to ensure courtroom safety.	
02/05/2020	Court Clinic report filed.	
02/08/2020	Mother not present. Judge: King, Hon. Kenneth J	King
02/08/2020	Father not present. Judge: King, Hon. Kenneth J	King
02/08/2020	Court issues order court draws inference that Ms. Conforto is the biological mother of Carla and Steve.	King
02/08/2020	Court issues order all medical records may viewed by all counsel.	King
02/08/2020	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J	King
02/13/2020	Medical records of Eva Ariane Guirand received from Boston Children's hospital.	
02/13/2020	Medical records of Steve Arjen Guirand received from Boston Children's Hospital.	
02/14/2020	Medical records of Steve Arjen Guirand, Eva Ariane Guirand received from Boston Children's Hospital.	
02/24/2020	Permanency plan filed.	
03/09/2020	Mother present in Court. Judge: King, Hon. Kenneth J	King
03/09/2020	Colloquy with father conducted. Judge: King, Hon. Kenneth J	King
03/09/2020	Father present in court. Judge: King, Hon. Kenneth J	King
03/09/2020	Surrender signed by father - Andre Petion for both Oliver and Deshae filed.	King
03/09/2020	Court issues order Atty Fenichel struck.	King
03/09/2020	Father not present. Judge: King, Hon. Kenneth J	King
03/09/2020	Motion filed with affidavit to withdraw by Atty Arsenault.	King
03/09/2020	Motion denied to withdraw by Atty Arsenault.	King
03/09/2020	Filed On this date Cindy A Fenichel, Esq. dismissed/withdrawn as Appointed CP/CHINS/CRA/GU for Respondent 2 Andre G Petion	
03/09/2020	Adoption surrender by father filed. Judge: King, Hon. Kenneth J	King

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03/09/2020	Ordered Rachel Koehler takes stand and gives testimony.	King
03/09/2020	Ordered Mild Freedman-Weiss takes stand and gives testimony.	King
03/09/2020	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J	King
03/09/2020	Exhibit #1, #3 and #4, #8 though #33, #38 through #42 admitted.	King
03/09/2020	Consent or notice to Andre G Petion shall not be required upon any legal proceeding for adoption, guardianship, custody or other disposition of subject child sponsored by DCF or agency. [FORM]	King
03/09/2020	Found In Need of Care and Protection. Judge: King, Hon. Kenneth J	King
03/09/2020	Father found unfit as a result of being unwilling, incompetent, and/or unavailable. Judge: King, Hon. Kenneth J	King
03/10/2020	Notice of hearing and order regarding possession of recording devices in the court house sent to Carla Marie Conforto returned to court listing fictitious name and address - see notice attached to returned documents filed.	
03/12/2020	Mother present in Court. Judge: King, Hon. Kenneth J	King
03/12/2020	Motion filed mothers oral motion that the case be dismissed due to being trademarked.	King
03/12/2020	Motion denied mothers oral motion that the case be dismissed due to being trademarked.	King
03/12/2020	Father not present. Judge: King, Hon. Kenneth J	King
03/12/2020	Ordered Shannon Casey takes the stand and gives testimony.	King
03/12/2020	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J	King
03/12/2020	Ordered Caroline Keefe takes the stand and gives testimony.	King
03/20/2020	Court orders rescheduling due to State of Emergency surrounding the Covid-19 virus.: Hearing on Merits (CR/CV) scheduled on: 03/23/2020 09:00 AM Has been: Rescheduled-Covid-19 emergency Hon. Kenneth J King, Presiding	King
03/20/2020	Court orders rescheduling due to State of Emergency surrounding the Covid-19 virus. Judge: King, Hon. Kenneth J	King
03/20/2020	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J	King
03/20/2020	Court orders rescheduling due to State of Emergency surrounding the Covid-19 virus.: Hearing on Merits (CR/CV) scheduled on: 03/26/2020 09:00 AM Has been: Rescheduled-Covid-19 emergency Hon. Kenneth J King, Presiding	King

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MASSACHUSETTS
MIDDLESEX COUNTY JUVENILE COURT
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03/20/2020	Court orders rescheduling due to State of Emergency surrounding the Covid-19 virus.: Hearing on Merits (CR/CV) scheduled on: 03/25/2020 09:00 AM Has been: Rescheduled-Covid-19 emergency Hon. Kenneth J King, Presiding	King
03/23/2020	Affidavit dated 03/23/20-request for precept filed.	Tan
03/23/2020	Precept issued for Desiree Penelope Petton. [FORM]	Tan
03/23/2020	FORM: C&P Precept Sent On: 03/23/2020 15:17:41	
03/24/2020	Court orders rescheduling due to State of Emergency surrounding the Covid-19 virus.: Hearing on Merits (CR/CV) scheduled on: 03/24/2020 09:00 AM Has been: Rescheduled-Covid-19 emergency Hon. Kenneth J King, Presiding	King
03/24/2020	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J	King
03/30/2020	DCF Affidavit dated 3/30/2020 filed.	King
03/30/2020	Precept recalled. Judge: Tan, Hon. Gloria Y	Tan
04/07/2020	Court orders rescheduling due to State of Emergency surrounding the Covid-19 virus.: Other Hearing scheduled on: 05/28/2020 09:00 AM Has been: Rescheduled-Covid-19 emergency Hon. Gloria Y Tan, Presiding	Tan
04/07/2020	Temporary mittimus to DCF. [FORM] Judge: Tan, Hon. Gloria Y	Tan
05/01/2020	Written order filed by the court. SCAN ***Order Regarding Documentary Exhibits*** Judge: King, Hon. Kenneth J	King
05/22/2020	Court issues order Counsel request via email for case to be scheduled for a Lobby on 05/28/20.	King
05/22/2020	Court issues order Email and Letter sent by mail to Carla Marie Conforto.	King
05/22/2020	Letter to Carla Marie Conforto dated 05/22/20 and email to Carla Marie Conforto dated 05/22/20 filed.	King
05/28/2020	Filed On this date Leslie Marie Martin, Esq. added as DCF Attorney for Petitioner DCF - Arlington	
05/28/2020	Filed On this date Brooke M Chen, Esq. dismissed/withdrawn as DCF Attorney for Petitioner DCF - Arlington	
05/28/2020	Court issues order case heard through Zoom due to COVID19 with Judge King, Attya. Martin, Altamora, Roche, Wilinski, Santoro, Arsenaault, and mother calls in at 11:25am.	King

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05/28/2020	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J.	King
08/05/2020	Amended witness and exhibit list filed.	
08/05/2020	Motion filed Release of prior hearing testimony to incorporate into ongoing trial.	
08/05/2020	Motion filed child's for short order of notice.	
08/05/2020	Motion filed Child's for an expedited homestudy/placement hearing.	
08/05/2020	Motion filed Child's for temporary restraining order to prevent DCF from removing the child from current placement.	
08/11/2020	DCF report in accordance with G.L. c. 119, s. 21A filed.	
08/11/2020	Court issues order case heard through zoom call due to COVID19 with Judge King, 2 interns, attys. martin, rocha/arsenault/cantoro/altamore/willinsk, ms keefe (dcf), ms freedman-Weiss (dcf).	King
08/11/2020	Mother present in Court. Judge: King, Hon. Kenneth J	King
08/11/2020	Father not present. Judge: King, Hon. Kenneth J	King
08/11/2020	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J	King
08/11/2020	Motion allowed expedited homestudy.	King
08/11/2020	Court issues order no action taken on motion for restraining order to prevent DCF from removing child from current placement- but absent an emergency. DCF to give parties 10 days notice- see motion as enclosed.	King
07/07/2020	Probation homestudy filed.	
07/09/2020	Affidavit of Oliver Petition filed.	
07/09/2020	Request to Leslie Martin filed.	
07/09/2020	Motion filed Compel the commonwealth for the entire court record.	
07/09/2020	Motion filed Discharge counsel and for appointment of counsel.	
07/09/2020	Affidavit filed.	
07/09/2020	Motion filed Compel the commonwealth to facilitate petitioner access to her biological children via visitation.	
07/09/2020	Affidavit filed.	
07/13/2020	Motion filed Motion to Withdraw and Affidavit.	
07/13/2020	Stipulation of Facts of Desiree Petition filed.	King
07/13/2020	Supplemental Witness and Exhibit List Since June 5, 2020 on behalf of the Minor child, Desiree Petition filed.	King
07/14/2020	Court issues order Case heard via ZOOM due to COVID19 emergency.	King
07/14/2020	Mother present in Court. Judge: King, Hon. Kenneth J	King
07/14/2020	Motion allowed Atty Arsenault's motion to withdraw.	King

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MASSACHUSETTS
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07/14/2020	Attorney removed/appearance vacated on behalf of mother. Judge: King, Hon. Kenneth J	King
07/14/2020	Motion allowed to discharge counsel and for the appointment of counsel.	King
07/14/2020	Motion allowed in part Allowed as to discharge, denied as to appointment of new counsel.	King
07/14/2020	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J	King
07/14/2020	Court issues order hearing stayed until 7/15/2020 @2pm.	King
07/14/2020	amended affidavit of Oliver Petion filed.	King
07/14/2020	Filed On this date Leslie J Arsenault, Esq. dismissed/withdrawn as Appointed CP/CHNS/CRA/GU for Respondent 1 Carla Marie Conforto	
07/15/2020	Court issues order Case heard via ZOOM due to COVID19 emergency.	King
07/15/2020	Father not present. Judge: King, Hon. Kenneth J	King
07/15/2020	Mother present in Court. Judge: King, Hon. Kenneth J	King
07/15/2020	Motion allowed Release of prior hearing testimony to incorporate into on goi trial.	King
07/15/2020	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J	King
07/17/2020	Notice of docket entry of interlocutory appeal denying mother's motion for counsel filed.	
07/17/2020	Photograph of children filed.	
07/17/2020	Court issues order case heard via Zoom due to COVID19.	King
07/17/2020	Father not present. Judge: King, Hon. Kenneth J	King
07/17/2020	Mother present in Court. Judge: King, Hon. Kenneth J	King
07/17/2020	copy of U.S. District Court filing- petition for a writ of habeas corpus filed.	King
07/17/2020	Ordered testimony of Caroline Keefe taken, DCF.	King
07/17/2020	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J	King
07/17/2020	order from Judge King re: mother's participation in the trial in this matter filed.	King
07/20/2020	Written stipulation, OF FACTS, filed by Desiree Penelope Patton.	King
07/27/2020	Court issues order Case heard via Zoom due to COVID19.	King
07/27/2020	Mother not present. Judge: King, Hon. Kenneth J	King
07/27/2020	Father not present. Judge: King, Hon. Kenneth J	King

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MASSACHUSETTS
MIDDLESEX COUNTY JUVENILE COURT
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07/27/2020	Court issues order testimony taken form DCF worker Caroline Keefe.	King
07/27/2020	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J	King
07/28/2020	Amended witness and exhibit list filed.	
07/28/2020	Motion filed Appointment of counsel and continuance of fairness and Affidavi	
07/28/2020	Memorandum of law in support of motion filed.	
07/28/2020	Court issues order case heard via Zoom due to COVID19.	King
07/28/2020	Mother present in Court. (in courthouse) Judge: King, Hon. Kenneth J	King
07/28/2020	attys. Martin/Wilinski/Santoro/Roache/Altamore/SW Koehler/SW Friedman-Weiss present in court.	King
07/28/2020	Motion denied appointment of counsel and continuance- out of fairness.	King
07/28/2020	Father not present. Judge: King, Hon. Kenneth J	King
07/28/2020	Court issues order testimony of Angela Gatto taken.	King
07/28/2020	Temporary mittimus to DCF. [FORM] Judge: King, Hon. Kenneth J	King
07/28/2020	Court issues order Atty. Martin notifies mother they plan on calling her as a witness during September trial.	King
08/07/2020	Written order filed by the court. SCAN (Regarding Appointment of Legal Advisor) Judge: King, Hon. Kenneth J	King
08/07/2020	Filed On this date Thomas W Fothergill, Esq. added as Appointed CP/CHINS/CRA/GU for Respondent 1 Carla Marie Conforto Appointed for the purpose of Care and Protection Cases c. 119, s.23(a)(3) t Judge Hon. Kenneth J King.	
09/04/2020	Notice of Change of Placement filed.	

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss

SUPREME JUDICIAL COURT
FOR SUFFOLK COUNTY
NO. SJ-2020-0578

Middlesex Juvenile Court
Cambridge Division
No. 19CP0037CA

IN RE: CARLA MARIE CONFORTO

JUDGMENT

This matter came before the Court, Budd, J., on a G. L. c. 211, § 3 petition, entitled In Re: Carla Marie Conforto. The petitioner seeks the superintendence power of this Court for appointment of counsel in her care and protection case, Middlesex Juvenile Court docket number 19CP0037CA. On August 7, 2020, the petitioner was appointed counsel, Thomas W. Fothergill.

Upon consideration thereof it is hereby ORDERED that the petition be, and the same hereby is, DENIED without hearing.

By the Court, (Budd, J.)

/s/Maura S. Doyle
Maura S. Doyle, Clerk

Entered: September 8, 2020

Stephen Cronin

From: Stephen Cronin <stephen.cronin@jud.state.ma.us>
Sent: Tuesday, September 8, 2020 11:59 AM
To: 'Cambridge Juvenile'
Subject: SJ-2020-0578, Carla Marie Conforto
Attachments: 20200908113205406.pdf

Clerk/Magistrate's Office,

Attached please find a judgment entered today in the above referenced matter. Should you have any questions, please contact me. Thank you.

Steve

Stephen J. Cronin

Third Assistant Clerk

Office of Clerk Maura S. Doyle

Supreme Judicial Court for the County of Suffolk

John Adams Courthouse

One Pemberton Square, Suite 1-300

Boston, MA 02108

617-557-1185 (direct)

stephen.cronin@jud.state.ma.us

—Original Message—

From: lt@sjc.state.ma.us [mailto:lt@sjc.state.ma.us]
Sent: Tuesday, September 8, 2020 11:32 AM
To: stephen.cronin <stephen.cronin@jud.state.ma.us>
Subject: Message from "RNP583879082DOC"

This E-mail was sent from "RNP583879082DOC" (MP 4055).

Scan Date: 09.08.2020 11:32:05 (-0400)
Queries to: lt@sjc.state.ma.us



The Commonwealth of Massachusetts

SUPREME JUDICIAL COURT

FOR SUFFOLK COUNTY

JOHN ADAMS COURTHOUSE

ONE PEMBERTON SQUARE, SUITE 1300

BOSTON, MASSACHUSETTS 02108-1707

WWW.SJCCOUNTYCLERK.COM

September 8, 2020

MAURA S. DOYLE
CLERK

CASE INFORMATION (617) 557-1100
FACSIMILE (617) 557-1117
ATTORNEY SERVICES (617) 557-1050
FACSIMILE (617) 557-1055

Carla Marie Conforto, Pro Se
1127 Harrison Avenue
Unit 6
Roxbury, MA 02119-3665

RE: No. SJ-2020-0578

IN RE: IMPOUNDED CASE

NOTICE OF DOCKET ENTRY

You are hereby notified that on September 8, 2020, the
following was entered on the docket of the above referenced case:

JUDGMENT: as on file. (Budd, J.)

A handwritten signature in cursive script, appearing to read "Maura S. Doyle".

Maura S. Doyle, Clerk

To: Carla Marie Conforto
Middlesex Juvenile Court / Cambridge

SUPREME JUDICIAL COURT

Suffolk, ss

JS-2020-0578
September 8, 2020

In Re Carla Marie Conforto

RECEIVED

SEP 09 2020

MAURA S. DOYLE CLERK
OF THE SUPREME JUDICIAL COURT
FOR SUFFOLK COUNTY

NOTICE OF APPEAL TO FULL COURT

Now comes Petitioner Carla Marie Conforto who does hereby
give notice I appeal Single Justice's denial of above captioned
matter.

By: Carla Marie Conforto
c/o 1127 Harrison Avenue
Unit Six
Boston, Massachusetts

CERTIFICATE OF SERVICE I certify I served all parties a copy of this Notice by email
due to COVID-19 By: Carla Marie Conforto 9th September 2020



The Commonwealth of Massachusetts

SUPREME JUDICIAL COURT

FOR SUFFOLK COUNTY

JOHN ADAMS COURTHOUSE

ONE PEMBERTON SQUARE, SUITE 1300

BOSTON, MASSACHUSETTS 02108-1707

WWW.SJCCOUNTYCLERK.COM

September 9, 2020

MAURA S. DOYLE
CLERK

CASE INFORMATION (617) 557-1100
FACSIMILE (617) 557-1117
ATTORNEY SERVICES (617) 557-1050
FACSIMILE (617) 557-1055

Carla Marie Conforto, Pro Se
1127 Harrison Avenue
Unit 6
Roxbury, MA 02119-3665

RE: No. SJ-2020-0578

IN RE: IMPOUNDED CASE

NOTICE OF ASSEMBLY OF THE RECORD
ON APPEAL OR ON RESERVATION AND REPORT TO THE FULL COURT

In accordance with the Rules of Appellate Procedure, Rule 9(e), notice this day has been sent to the Clerk of the Supreme Judicial Court for the Commonwealth, along with two (2) certified copies of the docket entries. The record has been fully assembled in the office of the Clerk of the Supreme Judicial Court for Suffolk County.

The appealing party must enter the case in the Supreme Judicial Court for the Commonwealth:

- a) if the appeal is subject to Mass. R. A. P. 10(a) and (b), within ten (10) days of receipt of this notice;
OR
- b) if the appeal is subject to S.J.C. Rule 2:21 (copy attached) within fourteen (14) days of the filing of the notice of appeal.

This notice does not constitute entry in the Supreme Judicial Court for the Commonwealth.

A handwritten signature in cursive script, reading "Maura S. Doyle".

Maura S. Doyle, Clerk

**RULE 2:21 APPEAL FROM SINGLE JUSTICE DENIAL OF RELIEF ON
INTERLOCUTORY RULING
(Applicable to civil and criminal cases)**

(1) When a single justice denies relief from a challenged interlocutory ruling in the trial court and does not report the denial of relief to the full court, the party denied relief may appeal the single justice's ruling to the full court. Unless the court otherwise orders, the notice of appeal shall be filed with the Clerk of the Supreme Judicial Court for Suffolk County within seven days of the entry of the judgment appealed from. Unless the single justice or the full court orders otherwise, neither the trial nor the interlocutory ruling in the trial court shall be stayed.

(2) The appeal shall be presented to the full court on the papers filed in the single justice session, including any memorandum of decision. Nine copies of the record appendix must be filed in the Office of the Clerk of the Supreme Judicial Court for the Commonwealth within fourteen days after the date on which the appeal is docketed in the full Supreme Judicial Court. The record appendix shall be accompanied by nine copies of a memorandum of not more than ten pages, double-spaced, in which the appellant must set forth the reasons why review of the trial court decision cannot adequately be obtained on appeal from any final adverse judgment in the trial court or by other available means. No response from the prevailing party shall be filed, unless requested by the court.

(3) This rule shall not apply to interlocutory appeals governed by Rule 15 of the Massachusetts Rules of Criminal Procedure.

(4) The full court will consider the appeal on the papers submitted pursuant to this rule, unless it otherwise orders.

If an appeal from a judgment is subject to S.J.C Rule 2:21, set forth above, please note that:

1) within seven (7) days of the entry of the judgment, (unless the court otherwise orders), the appealing party must file a notice of appeal with the Clerk of the Supreme Judicial Court for Suffolk County; AND

2) within fourteen (14) days of the date of the filing of the notice of appeal, the appealing party must:

- docket the appeal in the office of the Clerk of the Supreme Judicial Court for the Commonwealth and pay any docket fee required by law; AND

3) within fourteen (14) days of the docketing of the appeal in the office of the Clerk of the Supreme Judicial Court for the Commonwealth, the appealing party must:

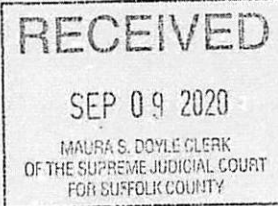
- file nine (9) copies of the memorandum and nine (9) copies of the record appendix with the Clerk of the Supreme Judicial Court for the Commonwealth.

SUPREME JUDICIAL COURT

Suffolk, ss

SJ-2020-0578
September 8, 2020

In Re Carla Marie Conforto



NOTICE OF APPEAL TO FULL COURT

Now comes Petitioner Carla Marie Conforto who does hereby
give notice I appeal Single Justice's denial of above captioned
matter.

By: Carla Marie Conforto
c/o 1127 Harrison Avenue
Unit Six
Boston, Massachusetts

CERTIFICATE OF SERVICE I certify I served all parties a copy of this NOTICE by email
due to COVID-19 By: Carla Marie Conforto 9th September 2020

Forecourt Paragon ®

IMPOUNDED

09/09/2020
11:38 amCommonwealth of Massachusetts
SUPREME JUDICIAL COURT
FOR SUFFOLK COUNTY
Docket SheetSJ-2020-0578
IN RE: IMPOUNDED CASE

CASE HEADER

Entered 08/17/2020
Case Status Disp: appeal by Pet pendg
Case Nature 211.3 - Superintendence c 211 s 3
Justice Budd, J.
Clerk AS
Disposition Decided: petition denied

Docket Type SJC Single Justice
Status Date 09/09/2020
Sub-Nature motapptc - Motion to Appoint Counsel
Under Advisement 09/08/2020
Public No - Impounded
Disposition Date 09/08/2020

Other Court Information

Lower Court Trial Court
Case Type CV
Trial Court
TC Number
TC Ruling Dt

Pet Role LCt Defendant in lower court
TC Not App Dt
TC Dispo

INVOLVED PARTY

Carla Marie Conforto
Petitioner
1127 Harrison Avenue
Unit 6
Roxbury, MA 02119-3665
Active 08/17/2020

Pro Se
Active 08/17/2020 Entitled,

ATTORNEY APPEARANCE

Middlesex Juvenile Court / Camb
(Lower Court: civil or general)
Office of the Clerk
121 Third Street
East Cambridge, MA 02141
Phone: 617-494-4100
Active 08/08/2020 Entitled, eMail Only (APC)

Clerk - SJC for the Commonwealth
Clerk for Commonwealth
1400 John Adams Courthouse
One Pemberton Square, Suite 1400
Boston, MA 02108
Active 08/09/2020 Entitled,

'cdssj', '373724', '242408', 'Y', 'Y', 'Y', 'Y', 'Y'

IMPOUNDED

09/09/2020
11:38 amCommonwealth of Massachusetts
SUPREME JUDICIAL COURT
FOR SUFFOLK COUNTY
Docket SheetSJ-2020-0578
IN RE: IMPOUNDED CASE

DATE	P#	ENTRY
08/17/2020		Case entered.
08/17/2020	1	(IMPOUNDED) Affidavit of Indigency Request for Waiver, Substitution or State Payment Fees & Costs pursuant to G. L. c. 261, s. 27A-G filed by Carla Marie Conforto, pro se.
08/17/2020	2	Petition under c. 211, s. 3, filed by Carla Marie Conforto, pro se.
08/17/2020	3	Determination Regarding Fees & Costs by Clerk: ALLOWED FORTHWITH.
08/31/2020	4	Unsigned email from "returnmypropertynow@protonmail.com" to Assistant Amy Stewart dated August 31, 2020, filed. No attachments to email.
08/31/2020	5	Email from Carla Marie Conforto filed pro se and referencing "appendix 1 p, petition for extraordinary relief 2 p, and affidavit 3 p" with six JPEG files attached.
08/31/2020	6	Email from Carla Marie Conforto filed pro se and referencing "appendix 1 p, petition for extraordinary relief 2 p, and affidavit 3 p" with six JPEG files attached. (Docket note: email and attachments appear to be a duplicate of paper no. 5).
08/31/2020	7	Unsigned email from "returnmypropertynow@protonmail.com" to Assistant Clerk Amy Stewart filed and referencing "Attached: Pages 21 & 22 of 22, MASSACHUSETTS MIDDLESEX COUNTY JUVENILE COURT, Public Docket Report 19CP0037CA total:22 pages, pages 21 & 22, EXHIBITS A, B, C, D" with nine JPEG files attached.
08/31/2020	8	Unsigned email from "returnmypropertynow@protonmail.com" to Assistant Clerk Amy Stewart filed and referencing "EXHIBIT E, ORDER RE MOTION TO WITHDRAW COUNSEL" with one JPEG file attached.
09/08/2020		Under advisement. (Budd, J.).
09/08/2020	9	Copy of Lower Court docket sheets, filed.
09/08/2020	10	JUDGMENT: "This matter came before the Court, Budd, J., on a G. L. c. 211, § 3 petition, entitled In Re: Carla Marie Conforto. The petitioner seeks the superintendence power of this Court for appointment of counsel in her care and protection case, Middlesex Juvenile Court docket number 19CP0037CA. On August 7, 2020, the petitioner was appointed counsel, Thomas W. Fothergill. Upon consideration thereof it is hereby ORDERED that the petition be, and the same hereby is, DENIED without hearing." (Budd, J.)
09/08/2020	11	EMAIL Notice to Counsel/Parties and Lower Court Re: P.# 10 filed.
09/08/2020	12	Notice to counsel/parties, regarding paper #11 filed.
09/09/2020	13	Notice of Appeal with Certificate of Service filed by Carla Marie Conforto, pro se.
09/09/2020	14	Notice of assembly of the record.
09/09/2020	15	Notice to counsel/parties, regarding paper #'s 13 & 14 filed.

A True Copy

Attest:

Date

Clerk



The Commonwealth of Massachusetts

SUPREME JUDICIAL COURT

FOR SUFFOLK COUNTY

JOHN ADAMS COURTHOUSE

ONE PEMBERTON SQUARE, SUITE 1300

BOSTON, MASSACHUSETTS 02108-1707

WWW.SJCCOUNTYCLERK.COM

September 9, 2020

MAURA S. DOYLE
CLERK

CASE INFORMATION (617) 557-1100
FACSIMILE (617) 557-1117
ATTORNEY SERVICES (617) 557-1050
FACSIMILE (617) 557-1055

Carla Marie Conforto, Pro Se
1127 Harrison Avenue
Unit 6
Roxbury, MA 02119-3665

RE: No. SJ-2020-0578

IN RE: IMPOUNDED CASE

In accordance with the Rules of Appellate Procedure, Nos. 9(e) and 10(a) and (b), the enclosed copy of the Notice of Appeal and the Notice of Assembly of the Record on Appeal or on Reservation and Report to the Full Court in the above-entitled case are hereby mailed to you.

The appealing party must enter the case in the Supreme Judicial Court for the Commonwealth:

a) if the appeal is subject to S.J.C. Rule 2:21 (copy attached), within fourteen (14) days of the filing of the notice of appeal;

OR

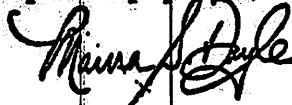
b) if the appeal is subject to Mass. R.A.P. 10(a) and (b), within ten (10) days of the receipt of this notice.

Entry of the case will be made in the Clerk's Office, Supreme Judicial Court for the Commonwealth, John Adams Courthouse, One Pemberton Square, Room 1400, Boston, Massachusetts 02108-1724, upon receipt of the filing fee of \$300.00, or upon written request if the appealing party has been permitted to proceed without payment of fees

in this court.

A copy of the record is available from this office for a fee of
\$.20 per page.

Very truly yours,



Maura S. Doyle, Clerk

To: Carla Marie Conforto
Middlesex Juvenile Court / Camb
Clerk - SJC for the Commonwealth

FILE
GROUNDS ONE AND ~~GROUND TWO~~

GROUND ONE (a) Supporting facts

1. On or about the 10th July 2020, I was informed by a student of law that an extreme conflict of interest ^{U.S. DISTRICT COURT MASS.} existed between TARA (Mother) due to a violent relationship with a Conforto family member
2. I filed a motion at a lower court level for the discharge of counsel and the appointment of new counsel see APPENDIX record #7
3. Lower court Judge King denied appointment of new counsel however acquiesced to the extreme conflict and discharged counsel.
4. Mother sought interlocutory review under chapter 231 Mass App. Ct. see APPENDIX
5. Inadequate state corrective process under c.231 resulted in a denial of Interlocutory review as there is no right to one under state statute.
6. c. 211 §3 was filed by Mother ^{Aug.} ~~July~~ 2020 #6 complete with an argument under ~~Halbert v. Michigan~~
7. On or about August 31, 2020 a series of emails between Second Assistant Clerk Amy C. Stewart and an unknown clerk references a highly controversial class member Akkima Dannielle Briscoe #5
8. Akkima Dannielle Briscoe is a fundamental rights class member

FILED
IN CLERKS OFFICE

9. Recipients use of the "Express Classification" in so far as ^{U.S. DISTRICT COURT} stating "remember her as Akkina's friend," stated on 3rd September 2020 #5
10. Akkina has previously filed multiple lawsuits JTC pleadings asserting fundamental rights, including US District Court lawsuit involving dcf custody and 42 USC § 1983 violations.
11. Five days after the recipients use of the classification the record was altered to indicate, or mislead the Single Justice in believing Mother had court appointed counsel when in fact she did not.
12. On September 8, 2020 Single Justice denied relief without a hearing stating counsel was appointed #
13. On the same date Edijo Cooper sent an email to Mother (Exhibit forthcoming) stating "You have been appointed an attorney"
14. Subsequently, Mother was misled into believing her newly appointed counsel would assist in preparing a case after the forementioned denial of counsel as stated above in ¶ 2

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2020 OCT 16 PM 4:20
U.S. DISTRICT COURT
DISTRICT OF MASS.
15 Shortly thereafter assumed appointed
counsel informed Mother he was a legal
advisor.

16. Subsequently on or about September 15, 2020
the lower court clerk in an appearance,
suggested to Mother that the Supreme Judicial Court
of Massachusetts made a mistake.
I had noticed upon exiting clerk's office multiple
clerks laughing having overheard the
remark the SJC made the mistake.

17. Such trickery in process in the obliterating or
the alteration upon facts of the interlocutory
review is so unfair as to violate
the Due process clause in its own force

Grounds Two
Supporting facts (a)

FILED
IN CLERKS OFFICE

2020 OCT 16 PM 4:21

1. Judicial clerks of the lower court or the
SJC are the Judicial branch of government.
2. The Judicial interference with TA&KA Mothers
fundamental right to access the courts,
assisted the Executive prosecutor / DCF.
3. As such the two powers of government
joined hands interfering with Mothers
fundamental rights to fair process, Faratta rights,
and rights under Halbert v Michigan
thus violating separation of powers doctrine.